

State of New Jersey DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF HAZARDOUS WASTE MANAGEMENT

John J. Trela, Ph.D., Director 401 East State St. CN 028 Trenton, N.J. 08625 609 - 633 - 1408

Certified Mail Return Receipt Requested

APR 2 6 1988

Edward A. Hogan, Esq. Porzio, Bromberg & Newman 163 Madison Avenue Morristown, NJ 07960

Dear Mr. Hogan:

Re: Amended Sampling Plan ECRA Case #86009 Hexcel Corp. 205 Main Street Lodi Boro, Bergen County

The Bureau of Environmental Evaluation and Cleanup Responsibility Assessment (BEECRA) has completed its review of the Amended Sampling Plan dated February 4, 1988.

Please be advised that the Amended Sampling Plan is hereby rejected. Please be further advised that the Conditional Sampling Plan Approval given to Hexcel Corp. on December 29, 1987 shall be implemented. The time requirements shall start upon receipt of this letter. The revisions proposed in the Amended Sampling Plan were found deficient and are discussed as follows:

- The submission of the Sampling Plan results within ninety (90) days is a condition of the approved ACO. Although this is required, if additional time is needed and a request for additional time is submitted an extension will be granted.
- The revision of groundwater monitoring wells and the addition of soil sampling in and around Molnar Road will not provide enough information to determine horizontal delineation of all contamination on site. Therefore, those monitoring wells and soil borings in the approved Sampling Plan dated December 28, 1987 shall be completed as proposed.
- The sampling required to determine gross alpha and beta can be deleted until such time the sampling results from the Department of Energy (DOE) investigation is received. If the report from DOE has not sufficiently satisfied the requirements, further testing will be necessary.

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- The HNU screening with 40% lab verification is acceptable provided the clean zone samples are included for lab analyses. In the absence of clean zone samples up to the property line, samples taken at the property line shall be submitted for lab analyses. The remainder of the 40% lab verification samples shall be taken at the vertical limits of contamination or at the location of the highest PID readings. Due to the lack of sensitivity of 10.2 lamp to methylene chloride, a 11.7 lamp shall be used in addition to the standard 10.2 lamp which has adequate sensitivity to PCE.
- Hexcel Corp. shall submit on a site map the exact location of the transformer fire. The general information provided to this office is not sufficient. Therefore, details specific to this incident shall be required.
- The proposal to delete priority pollutant plus 40 (pp+40) in the vicinity of the aboveground storage tank is not acceptable. This is because the QA/QC supportive data was not available.
- Hexcel Corp. shall indicate on a site map the locations of the present and former fuel oil and hot oil system tanks with sampling results listed on the site map.
- The recommendation for total PCB's requires the laboratory to report the 7 EPA listed arochlors if found in the designated samples.
- The location of the former holding pond at the facility is unclear. Hexcel Corp. shall submit additional information with the location and dates the pond was actively used and how the pond was decommissioned.
- Rocky Mountain Laboratory was proposed by Hexcel Corp. in their initial proposed Sampling Plan. Rocky Mountain Laboratory or another NJDEP approved laboratory shall be used on this site.
- The information provided on the production well is limited. Additional information is still required which shall include flow rate, depth, diameter, length of casing, pump setting, well log and well use which shall include all system connections to the cooling system. Also include well history regarding type of pumping equipment used and pipe connections that were dismantled because of a change in process systems.

This document was prepared by the Case Manager, Mike Nalbone. If you have any questions, please contact the Case Manager at 609-63307141.

Very truly yours,

Lumb T. Had

Kenneth T. Hart, Chief

Bureau of Environmental Evaluation and Cleanup Responsibility Assessment

MAN: dg

cc: Brian Sogorka, BEERA
 Jeff Fehr, NJGS
 Robert Powell, Environ Corp.